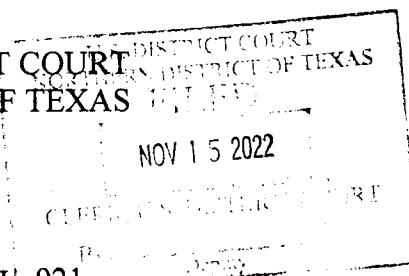


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:22-MJ-921

XAVIER DESEAN WATSON
a/k/a "Xavier", "XAECO", "ghostspc",
"nomore.wonderland", "and "Xavier Strapz"

CRIMINAL COMPLAINT

Alleged Offenses:

I, Special Agent J. Massey, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Between on or about March 8, 2022 and October 26, 2022, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendant **Xavier Desean Watson**, also known as Xavier, XAECO, ghostspc, nomore.wonderland, and Xavier Strapz, did knowingly possess and transfer machineguns in violation of 18 U.S.C. §§ 922(o) and 924 (a)(2).

Probable Cause:

1. I am a special agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), assigned to Dallas Field Division – Fort Worth Field Office. I have been a SA with ATF for about 13 years. I have participated in and conducted hundreds of investigations involving firearm-related offenses and violations of the federal firearms statutes, including illegal firearms trafficking; firearm possession by prohibited persons; illegal machinegun possession; illegal dealing in firearms without a license; illegal possession and use of firearms in connection with drug-trafficking and violent offenses; and the illegal manufacturing of firearms, machineguns, and firearm silencers or mufflers.

Based on my training and experience, I am familiar with the federal firearm statutes and the various means and methods by which the previously listed firearm offenses are facilitated and committed by individuals, conspiracies, and criminal enterprises. The statements set forth in this affidavit are true and correct to the best of my knowledge and belief but are not inclusive of all the evidence or information in the case.

2. As used throughout this complaint, the term, *machinegun*, means a firearm that shoots automatically more than one shot, without manual reloading, by a single function of the trigger. The term, *machinegun*, includes any part or combination of parts designed and intended to convert a firearm into a machinegun. The term, *Glock switch*, means a specific part or combination of parts that are designed to convert a semiautomatic *Glock* pistol into a machinegun. And the term, *AR auto sear*, means a part or combination of parts designed to convert AR-style semiautomatic rifles and pistols into machineguns.

3. In February of 2022, ATF received information from multiple sources that Jose Corral Santillan was involved in the repeated sale of *Glock switches*. The investigation of Santillan revealed he conspired with Montavion Jones and Ayoob Wali to possess and distribute hundreds of 3D-printed *Glock switches* and *AR auto sears*. The investigation included multiple audio- and video-recorded controlled buys from Jones and Santillan for hundreds of *Glock switches* and *AR auto sears*, as well as firearms equipped with these devices, using an ATF undercover (UC) agent and an ATF confidential informant (CI). From this, the investigation discovered Wali supplied Santillan with the 3D-printed *Glock switches* and *AR auto sears*.

4. On or about May 3, 2022, ATF executed federal search and arrest warrants for Santillan and Wali. In Wali's bedroom, ATF recovered around 172 3D-printed *Glock switches* and *AR auto sears*. Wali and Santillan were arrested. Santillan pled guilty to possessing and transferring *Glock switches* and *AR auto sears* and was sentenced to 57 months in prison in case no. 4:22-CR-181-O. Wali was indicted for possessing and transferring *Glock switches* and *AR auto sears* and is set to plead guilty in case no. 4:22-CR-207-Y. Jones was arrested on or about June 8, 2022. He pled guilty to possessing and distributing *Glock switches* and *AR auto sears* and is awaiting his sentencing hearing in case no. 4:22-CR-229-Y.

5. In *Mirandized* interviews, Wali initially claimed he found the machinegun conversion devices in a vehicle he purchased. Throughout his interviews, Wali made numerous conflicting and false statements. At many points, Wali refused to provide pertinent details regarding the source of supply of the 3D-printed machinegun conversion devices. Over the course of the interview, Wali claimed, in summary, that his contact for the 3D-printed machinegun conversion devices was a black male, around 30 years old, possibly known to Wali as "**Xavier**." Wali said "**Xavier**" drove a white sedan, possibly a Toyota Corolla. Wali showed ATF Task Force Officer (TFO) Bryan Cline his cell phone, and TFO Cline observed text messages between Wali and an individual identified in Wali's phone contacts as "**Xavier Strapz**" with the associated phone number, 214-989-8647.

6. TFO Cline also saw a series of photographs and videos showing the 3D-printed machinegun conversion devices and showing them being 3D printed, which Wali had received in text messages from the 8647 number. Wali provided TFO Cline and me with coordinates retrieved from the text messages with the 8647 number, for an apartment complex where Wali claimed he picked up machinegun conversion devices and was told where to deliver them. I later input these coordinates (32.86121N, 96.54552W) into a Google Earth program and learned the coordinates were for the Hubbard's Ridge apartment complex on Point Boulevard in Garland, Texas. This apartment complex was on a small peninsula on Lake Ray Hubbard, which I recognized as a location where Wali's cell phone had been located while I was monitoring his real-time location data, which had been obtained pursuant to a federal search warrant. Wali claimed this was the primary location where he had picked up machinegun conversion devices.

7. Wali provided a second address for a place on Grigsby Road in Dallas, Texas, as a secondary location where he had picked up machinegun conversion devices. Wali claimed he never sold the devices but was merely instructed to pick them up and then given a location to drop them off. Wali's descriptions of this process were vague and lacked specific detail. Wali provided the above-referenced photographs and videos to TFO Cline via text message, and then deleted the text messages with the 8647 number from his cell phone.

8. Thereafter, I examined the contents of Wali's cell phone pursuant to a federal search warrant. I searched open-source and law-enforcement databases. I reviewed phone records. I spoke with other law enforcement officers.

I reviewed the contents of Instagram records obtained from a federal search warrant in a prior investigation involving machinegun conversion devices. And I conducted physical surveillance. From all of this, I identified **Xavier Desean Watson**, also known as **Xavier and Xavier Strapz** to Wali, as the likely manufacturer and source of the 3D-printed machinegun conversion devices.

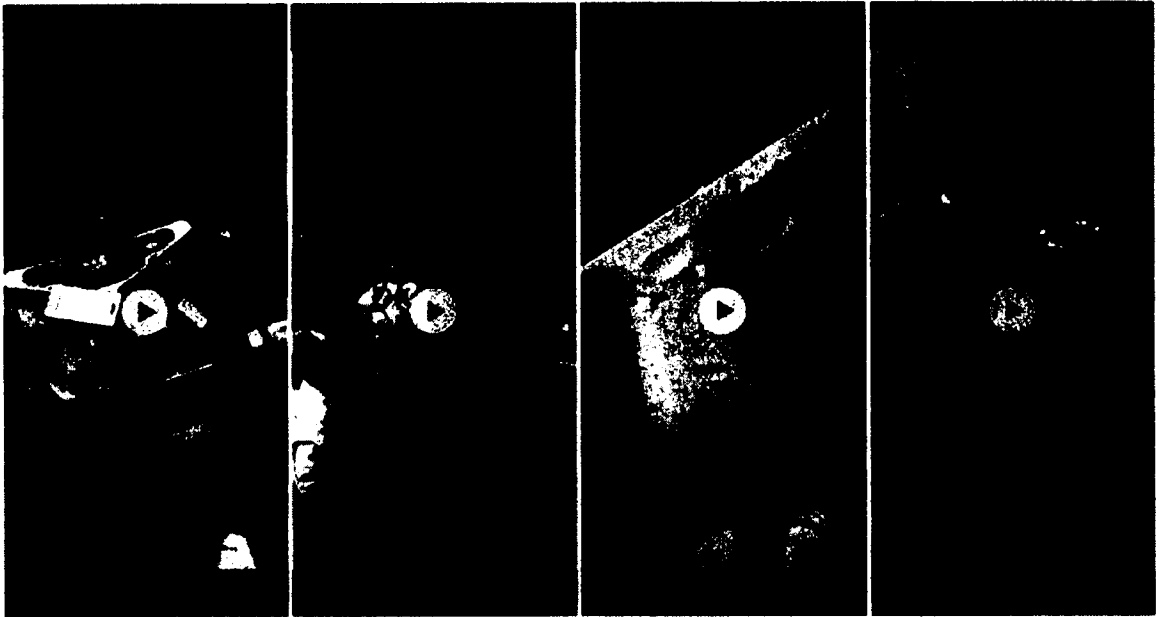
9. On or about October 7, 2022, I interviewed a Denton Police Department CI, who is cooperating with law enforcement in the hopes of gaining credit toward pending federal charges. The CI said he/she met a black male, known to the CI as “**Xavier**,” about three years ago. Based on the totality of the description, the specific details, and context, I recognized “**Xavier**” as **Watson**.

10. The CI recalled that two or three years ago, **Watson** was involved in selling stolen firearms. The CI said that about a year ago, **Watson** acquired a 3D printer and began manufacturing and selling machinegun conversion devices and personally made firearms, commonly referred to as “ghost guns.” The CI showed me a video of Wali shooting a pistol that appeared to function as a machinegun. The CI admitted to introducing Wali to **Watson**, and that Wali had purchased 3D-printed machinegun conversion devices from **Watson**. I observed Snapchat messages between the CI and an account the CI identified as belonging to **Watson**, which included text-message communications between the CI and **Watson** in which **Watson** stated he had machinegun conversion devices to sell or provide.

11. A couple days later, the Denton CI provided me with map coordinates the CI said he/she received from **Watson** via text message. The CI explained that he/she had contacted **Watson** via text message with the intent of meeting with **Watson** at **Watson's** residence. The CI explained that **Watson** had provided the CI with a link to a map of coordinates the CI understood to be the location of **Watson's** residence. I viewed these coordinates in a mapping application and found they were consistent with the location of the Hubbard's Ridge apartment complex on Point Boulevard in Garland. I had previously conducted surveillance of **Watson** and observed him entering apartment 6103.

12. On or about October 13, 2022, I spoke with the Denton CI, and he/she explained that on the evening of October 12, 2022, the CI met with **Watson** at apartment 6103. The CI said inside **Watson's** apartment, in the living room, are two 3D printers, which were not operating at the time of the CI's visit. The CI also saw firearms and firearms parts and accessories inside **Watson's** apartment. The CI said when they talked about machinegun conversion devices, **Watson** left the apartment empty handed, and returned with a plastic bag containing what the CI believed to be around 50 *Glock switches*. The CI said **Watson** demonstrated how to install a *Glock switch*. The CI said **Watson** could sell *Glock switches* for the price of two for \$50.00. The CI said he/she told **Watson** the CI had an associate who wanted to buy *Glock switches*, and that **Watson** agreed to meet the CI's associate to sell the machinegun conversion devices. The CI provided me with three videos the CI had taken inside **Watson's** apartment that showed a plastic tub containing what I recognized as firearms parts and accessories sitting on a table beside a pistol, two 3D printers sitting on a

table with spools of plastic filament, one 3D-printed pistol frame, and two metal AR-style lower receivers sitting with firearms parts and accessories on a couch. Below are captures from the videos the CI provided me.

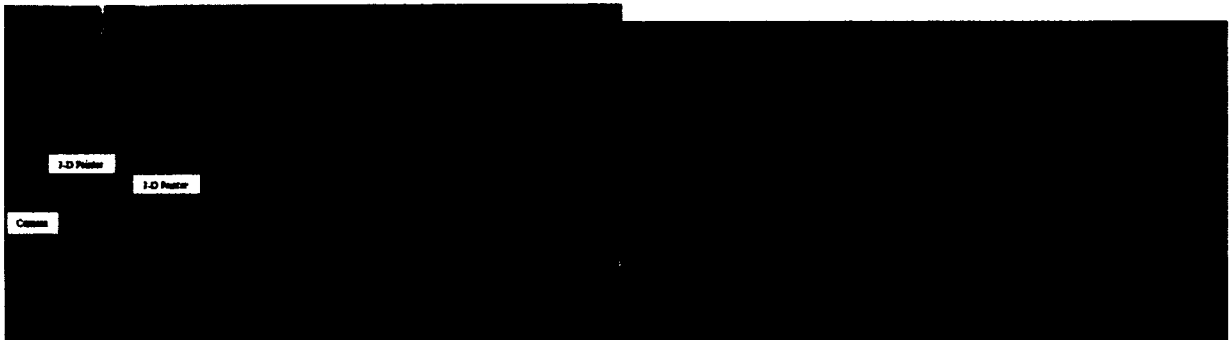


13. Between on or about October 16, 2022, and October 18, 2022, the Denton CI engaged in text-message communications with **Watson** at my direction and arranged for an ATF Special Agent acting in an undercover (UC) capacity to meet with **Watson** to buy ten *Glock switches* for \$600.

14. On or about October 18, 2022, ATF conducted a video-recorded controlled buy of machinegun conversion devices from **Watson**. In accordance with standard protocol, I searched the Denton CI for any contraband and money with negative results. The CI and the UC SA were equipped with audio- and video-recording equipment and prerecorded funds,

and they traveled under surveillance to meet with **Watson** at his 6103 apartment on Point Boulevard in Garland.

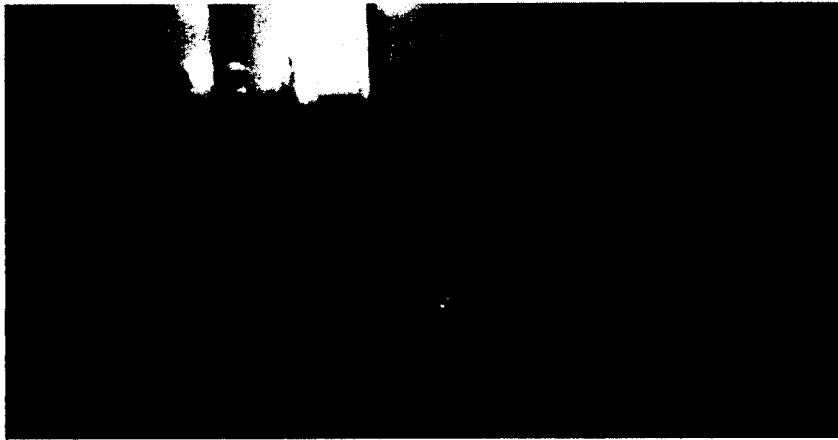
15. The UC SA and CI arrived in the parking lot and, after contacting **Watson** via text, observed **Watson** exit the apartment to meet them in the parking lot. Then **Watson**, the UC SA, and the CI entered **Watson's** 6103 apartment. **Watson** said the machinegun conversion devices were not yet complete. The UC SA entered the living room and saw two 3D printer devices as depicted below.



16. The UC SA also saw a black pistol on the coffee table near the couch. **Watson** placed components of *Glock switches* on top of a Tupperware container that appeared to contain marijuana. The UC SA asked **Watson** if the *Glock switches* worked, which **Watson** affirmed. **Watson** said he would show the UC SA how to ensure the *Glock switches* worked and then retrieved the pistol from the coffee table to perform a function test. **Watson** removed the back plate from the pistol and inserted a *Glock switch* where the back plate had been. While talking with the UC SA, **Watson** completed the function test of the Glock pistol with the *Glock switch* installed. **Watson** explained that when he began making the machinegun conversion devices, he shipped the devices out of town.

Watson also described occasions when he tested his *Glock switches* and *AR auto sears* to ensure they functioned as fully automatic. The UC SA explained that he intended to ship the *Glock switches* in the mail, and **Watson** responded saying he had mailed the devices by placing them inside a Mr. Potato Head toy. **Watson** then removed the *Glock switch* from the pistol and showed the UC SA a “prototype” of a flat-backed *Glock switch* machinegun conversion device. **Watson** said he hoped to soon produce these devices, but the “prototype” did not function properly. **Watson** also said he intended to begin producing metal machinegun conversion devices.

17. **Watson** and the UC SA discussed **Watson’s** prices for larger orders of machinegun conversion devices in the future. **Watson** said between the two 3D printers, he could produce about 400 machinegun conversion devices in a day. **Watson** began discussing Wali, and indicated that while selling to Wali, **Watson** had possessed 800 machinegun conversion devices at one time. **Watson** explained that prior to producing the order of 800 machinegun conversion devices, Wali had acquired close to “15” from **Watson**. The UC SA understood this to mean that Wali had acquired close to 1,500 machinegun conversion devices from **Watson** over time. **Watson** expressed knowledge that Wali was selling the machinegun conversion devices. During the conversation, **Watson** was using a computer tablet on the couch (pictured below), explaining that the files associated with the production of the machinegun conversion devices were located on the computer tablet.



18. The UC SA asked **Watson** if he had any *AR auto sear* devices, at which point **Watson** retrieved a blue plastic *AR auto sear* from the floor of the apartment. The UC SA bought two *AR auto sears* from **Watson** for \$150, and **Watson** provided a third *AR auto sear* for free. **Watson** said he had two associates who had been arrested and charged for possession of machinegun conversion devices, including one who had sold around fifteen of the devices to ATF. **Watson** said that another associate had been arrested in possession of machinegun conversion devices in Mississippi. **Watson** explained his understanding of the maximum criminal penalty for possessing machinegun conversion devices, which caused him to dislike maintaining the devices.

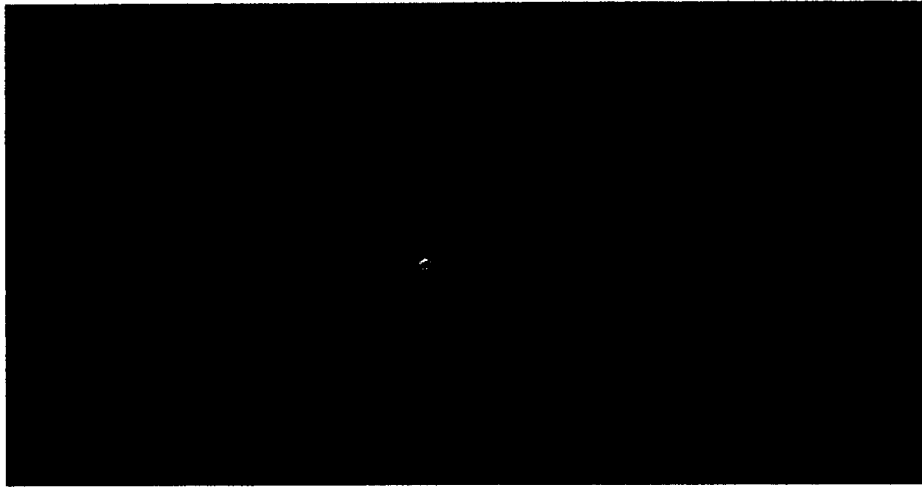
19. **Watson** said the *Glock switch* he was printing for the UC SA would cause a Glock pistol to function as a fully automatic machinegun once installed. **Watson** showed the UC SA the 3D printer right before it began printing one of the components of the *Glock switch*. As depicted below, after the 3D printer completed printing the components of the *Glock switches*, **Watson** put on a glove and began assembling the *Glock switches*.



20. **Watson** provided the UC SA with ten *Glock switches* for \$600. Together with the three *AR auto sears*, the UC SA paid **Watson** \$750 for the machinegun conversion devices. **Watson** used an AR-15-style lower receiver to demonstrate how to install an *AR auto sear*. The UC SA and CI left **Watson's** apartment and returned to a predetermined meeting location where I searched the CI for contraband with negative results.

21. Between on or about October 23 and October 25, 2022, the UC SA and **Watson** exchanged text messages where the UC SA arranged to buy 20 *Glock switches* and one personally printed AR-15 style pistol with an installed *AR auto sear* for \$4,000. The UC SA asked **Watson** to print the *Glock switches* in red and glow-in-the-dark colors and **Watson** agreed.

22. On or about October 26, 2022, ATF conducted a second video-recorded controlled buy from **Watson** at apartment 6103 on Point Boulevard in Garland. When entering **Watson's** apartment, as depicted below, the UC SA saw the two 3D printers and a pistol on the couch.



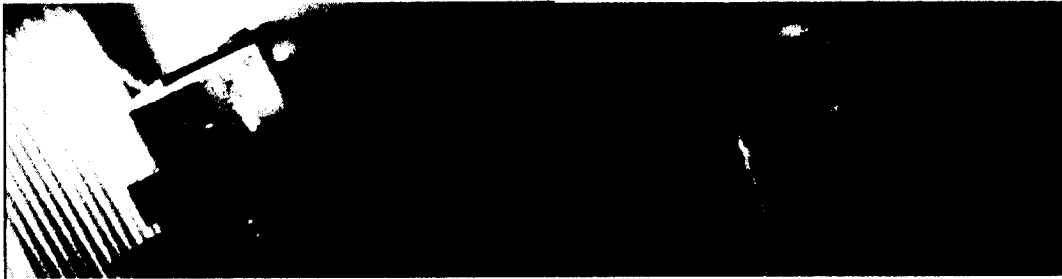
23. **Watson** provided the UC SA with the personally made AR-15 style pistol. **Watson** took the firearm back and demonstrated the features of the firearm to the UC SA. **Watson** explained the process of making the AR-15 style pistol, including the components he purchased and the amount of time it took to receive them. And **Watson** provided recommendations for what type of magazines to use in the firearm.

24. At the UC SA's request, **Watson** removed the *AR auto sear* from within the personally made AR-15 style pistol. **Watson** said he was not concerned about traveling with this type of firearm with a machinegun conversion device installed because it was not visible. **Watson** explained that once he had completed manufacturing a flat-back *Glock switch*, he would be able to ride in a vehicle with the *Glock switch* installed on a Glock pistol because it would not be overtly noticeable.

25. **Watson** disassembled the personally made AR-15 style pistol again to apply oil to the internal mechanisms, and the UC SA asked **Watson** to reinstall the *AR auto sear*, which **Watson** did.

As pictured below, **Watson** began to assemble the 3D-printed *Glock switch* components, again putting a glove on and using a screwdriver to assemble the 3D-printed *Glock switches*.

Watson explained he had turned the knobs on the 3D printer to help it produce cleaner prints than the last batch of *Glock switches*.



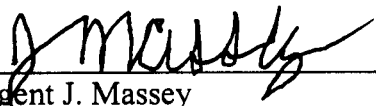
26. **Watson** described a male customer who placed orders for 200 *Glock switches*.

Watson discussed losing money when dealing with this person after he stopped paying for devices **Watson** had already printed. **Watson** said he had sold this person between 400 and 600 machinegun conversion devices, divided between both types. **Watson** explained the time it took to print such a large quantity and explained how he learned which screws to use when assembling the *Glock switches* to prevent them from cracking. The UC SA paid **Watson** \$4,000 and **Watson** provided the UC SA 20 *Glock switches* printed in both red and glow-in-the-dark plastic and the personally made AR-15 style pistol with the installed *AR auto sear*.

27. On or about April 4, 2022, Firearms Enforcement Officer (FEO) Eisenbise examined 15 *Glock switches*, and five *AR auto sears*, and a Glock pistol with an installed *Glock switch*, all of which were purchased from Jones during the first two controlled buys.

Santillan admitted to providing these machinegun conversion devices to Jones and admitted he had received them from Wali. Wali had admitted to receiving the machinegun conversion devices from "Xavier," who is **Watson**. FEO Eisenbise conducted test fires of the Glock pistol, as well as one exemplar of the *Glock switches* and two exemplars of the *AR auto sears* and found that each of the tested devices allowed a firearm to shoot automatically, more than one shot, without manual reloading, with a single function of the trigger. FEO Eisenbise observed that each of the untested machinegun conversion devices were identical in size, shape, dimension, design, and material to those test fired. FEO Eisenbise determined that each of the devices and the firearm purchased from Jones met the definition of a "machinegun" under 18 U.S.C. § 921(a)(23) and 26 U.S.C § 5845(a)(6) and (b). I provided photographs of the *Glock switches* and *AR auto sears* purchased from **Watson** during the two controlled purchases described above to FEO Eisenbise. Upon examination of the photos, FEO Eisenbise determined that each of the items in the photos were a part or combination of parts designed and intended to convert a firearm into a machinegun. FEO Eisenbise advised me that each device met the definition of a machinegun under the Gun Control Act and the National Firearms Act.

28. Accordingly, based on the above facts and circumstances, I respectfully submit that there is probable cause to believe that **Xavier Desean Watson**, also known as Xavier, XAECO, ghostspc, nomore.wonderland, and Xavier Strapz, has illegally possessed and transferred machineguns in violation of 18 U.S.C. §§ 922(o) and 924(a)(2).



Special Agent J. Massey
Bureau of Alcohol, Tobacco, Firearms, and Explosives

SWORN AND SUBSCRIBED before me on this 15TH day of November 2022, at 1:34 am/pm, in Fort Worth, Texas.



HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE